

While Centra does not oppose Plaintiff's request to partially unseal these records (so long as any irrelevant patient health information is redacted and the remainder of these records are designated as Confidential under the Protective Order), Centra disputes Plaintiff's claim that all of these records "are clearly material to both the claims and the counterclaims." (ECF No. 71). Centra anticipates that many of these records will not be relevant to this case. Plaintiff's overbroad subpoena goes beyond EMTALA issues and requests records "in connection with any complaint." Moreover, much of the VDH investigation and its findings had nothing to do with EMTALA. These other issues unrelated to EMTALA have place in this case and Centra reserves its right to object to the discoverability, relevance or admissibility of these records or their use in this case.

Dated: September 17, 2021

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notice to the following counsel of record:

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/s/